



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

FEB - 9 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. John Heins
Plant Manager
Trident Seafoods Corporation
Naknek Alaska Facility
5303 Shilshole Avenue NW
Seattle, Washington 98107

Re: Risk Management Program Compliance Inspection
Trident Seafoods – Naknek Alaska Plant
EPA Facility ID Number 1000 0020 8802

Dear Mr. Heins:

On August 14, 2014, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Trident Seafoods Corporation (Trident Seafoods) facility, located at Mile Marker ½, Alaska Peninsula Highway, Naknek, Alaska. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Mechanical Integrity requirements:** Trident Seafoods failed to ensure the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience as required by 40 C.F.R. § 68.73(d)(3). Trident Seafoods' mechanical integrity policy dated March 11, 2009, stated that the pressure relief valves must be replaced no later than five years after their installation date. During the inspection, the EPA inspectors identified the following pressure relief valves as being overdue for replacement: IM3-LTRS-SRV4, IM1-LTRS-SRV4, and ACC-SRV-13/14.
2. **Process Safety Information requirements:** Trident Seafoods failed to meet recognized and generally accepted industry practices for their engine room ventilation system as required by 40 C.F.R. § 68.65(d)(2). During the inspection, the EPA understands that Trident Seafoods has identified a design issue with the engine room ventilation system and will correct the problem prior to the start-up of the ammonia refrigeration system for the 2015 season.

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. The EPA understands that the facility is shut down for the season. These actions must be completed before restarting the system. A copy of the substantiating documentation must be sent to Javier Morales, RMP Coordinator. These documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101
Fax: (206) 553-0124

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly McFadden", is positioned above the printed name.

Kelly McFadden, Manager
Pesticides and Toxics Unit